

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KRISTEN SLUYSKI, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

AMERICAN GENERAL LIFE
INSURANCE COMPANY,

Defendant.

**DECLARATION OF WOODROW E. THATCHER IN SUPPORT OF NOTICE OF
REMOVAL**

I, Woodrow E. Thatcher declare the following:

1. I have personal knowledge of the facts set forth in this declaration, or I have knowledge of such facts based on my review and knowledge of the business records of Defendant American General Life Insurance Company ("AGLI"), and could testify to the same if called as a witness in this matter. I make this Declaration in support of AGLI's Notice of Removal of this action.

2. I am currently the Vice President of Life and A & H Operations for AGLI. In this capacity, and as part of my job responsibilities, I am familiar with AGLI's operations, and have access to its corporate books and records as well as financial and claims information.

3. My review of AGLI's internal data confirms that, during the period from April 1, 2013 to the present, AGLI has paid out death benefit payments to thousands of named beneficiaries in the United States.

I hereby declare under penalty of perjury of the laws of the United States that the foregoing statements are, to the best of my knowledge and belief, true and accurate.

Executed this 1st day of March, 2018 in Houston, Texas.



Woodrow E. Thatcher